



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 19 2011

REPLY TO THE ATTENTION OF:

Ed Bakowski
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Bakowski:

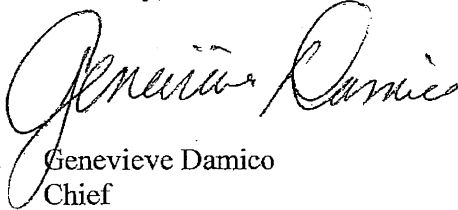
The U.S. Environmental Protection Agency has the following comments on the Illinois Environmental Protection Agency's draft of the Clean Air Act Permit for Chicago Heights Steel, (application number 96030081). The existing source is major under the Title V program. The source is located in an area recognized as an Environmental Justice area.

- 1) Throughout the permit, applicable emission rate citations are used to establish applicable requirements without actually including the numerical limit. The permit should specify the numerical applicable limit for the corresponding criteria pollutant for each emission unit. As an example, condition 4.1.2.b.i.A requires the source to limit particulate matter emissions to rates specified in 35 IAC 212.321(c), but does not specify the rate. Other conditions that use this scheme include conditions: 4.2.2.b.i.A, 4.3.2.b.i.A., 4.4.2.b.i.A., and 4.5.2.b.i.A.
- 2) Throughout the permit, the facility is required to keep records of emission factors, along with supporting documentation, in order to demonstrate compliance with emissions restrictions and applicable limitations for many of the regulated criteria pollutants. For example, condition 4.1.2.d.ii.E. requires the source to use emission factors derived from the most recent stack test to determine emissions and whether the source is in compliance with applicable limitations. In other conditions (for example condition 4.3.2.d.ii.B), the language is not clear on how the emission factors are derived. Is there a discussion in the statement of basis, or somewhere else in the permit record, of how these emission factors are derived and the basis to how they are sufficient for the facility to use for compliance demonstration?
- 3) The permit appears to list a condition twice. The second listing of condition 4.1.2.d.ii.C should probably be condition 4.1.2.d.ii.E.
- 4) Please consider changing language used in condition 4.1.2.d.ii.C. Current language reads, "...with the manufacturer's specifications, whatever coming first." Consider changing "whatever coming first" to "whichever comes first".

We provide these comments to help ensure that the project meets all federal requirements, that the permit provides all necessary information so that it is readily accessible to the public, and that the record provides adequate support for the permit decision.

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,

A handwritten signature in cursive script, reading "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name and title.

Genevieve Damico
Chief
Air Permits Section